

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

**GOVERNMENT'S MOTION TO GRANT DEFENDANT
A THREE LEVEL DECREASE IN OFFENSE LEVEL
FOR ACCEPTANCE OF RESPONSIBILITY**

The United States of America, by and through its attorneys, Peter F. Neronha, United States Attorney, and Pamela E. Chin, Assistant United States Attorney, moves this Honorable Court, pursuant to USSG § 3E1.1, for a three level decrease in the defendant's offense level based upon his acceptance of responsibility and because his timely notification of his intention to enter a plea of guilty permitted the government to avoid preparing for trial and to allocate its resources more efficiently.

Respectfully submitted,

UNITED STATES OF AMERICA
By its Attorney,

PETER F. NERONHA
United States Attorney

/s/ Pamela E. Chin

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of September, 2013, a copy of the within "Government's Motion to Grant Defendant a Three Level Decrease in Offense Level for Acceptance of Responsibility" was filed electronically and is available for viewing and downloading from the ECF system.

Judith Crowell, Esq.
128 Dorrance Street
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/s/ Pamela E. Chin

Pamela E. Chin
Assistant U. S. Attorney